

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

DENNIS ROSS and ANGELA  
SCHUH, on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

COMMUNITY HEALTH SYSTEMS,  
INC., CHSPSC, LLC, WILKES-  
BARRE HOSPITAL COMPANY,  
LLC, d/b/a COMMONWEALTH  
HEALTH, MOSES TAYLOR  
HOSPITAL, REGIONAL HOSPITAL  
OF SCRANTON, SCRANTON  
HOSPITAL COMPANY, LLC, and  
WILKES-BARRE GENERAL  
HOSPITAL,

Defendants.

Civil Action No.: 3:23-cv-02128

**MOTION TO STAY DEADLINE TO RESPOND TO COMPLAINT BY  
DEFENDANTS CHSPSC, LLC, WILKES-BARRE HOSPITAL COMPANY,  
LLC, D/B/A COMMONWEALTH HEALTH, MOSES TAYLOR  
HOSPITAL, REGIONAL HOSPITAL OF SCRANTON, SCRANTON  
HOSPITAL COMPANY, LLC, AND WILKES-BARRE GENERAL  
HOSPITAL**

Defendants CHSPSC, LLC, Wilkes-Barre Hospital Company, LLC d/b/a  
Commonwealth Health, Moses Taylor Hospital, Regional Hospital of Scranton,  
Scranton Hospital Company, LLC, and Wilkes-Barre General Hospital (collectively,

“Defendants”) respectfully move to stay their deadline to respond to Plaintiffs’ Complaint.

There is currently a proceeding before the U.S. Judicial Panel on Multidistrict Litigation (“JPML”) where a Motion for Transfer and Centralization was filed on October 16, 2023, to the District of Minnesota pursuant to 28 U.S.C. § 1407. *See Skurauskis, v. NationsBenefits Holdings, LLC*, Case No. 0:2023cv60830; *In Re Fortra File Transfer Software Data Security Breach Litigation*, MDL No. 3090. The granting of this motion would impact this case. To preserve the resources of the Court and the parties, the instant matter should be stayed pending the outcome of that motion. Contemporaneously with this motion, Defendants have submitted a supporting Memorandum of Law.

Respectfully submitted,

/s/ Michael S. Friedman

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Hospital Company, LLC, and Wilkes-  
Barre General Hospital*